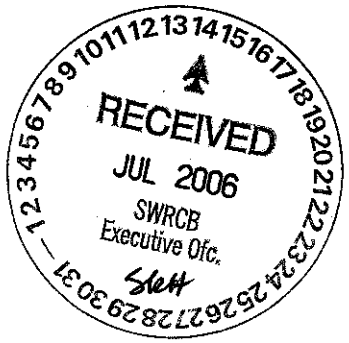
Chlorine Policy
Deadline: 7/14/06 5pm

MARIN MUNICIPAL WATER DISTRICT

220 Nellen Avenue Corte Madera CA 94925-1169
www.marinwater.org

July 14, 2006



Song Her, Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814
Fax: (916) 341-5620

Comments – Chlorine Policy:

Summary of Comments In Advance Of The State Water Resources Control Board (SWRCB) Public Hearing on the Proposed Total Residual Chlorine And Chlorine-Produced Oxidants Policy Of California **(TRC Policy)**

Dear Ms. Her:

The Marin Municipal Water District (MMWD) appreciates the opportunity to comment on the June 2006 draft of the TRC Policy. MMWD serves a population of 190,000 in Marin County and supplies drinking water through approximately 900 miles of distribution pipelines, 140 storage tanks, and 95 pump stations. In order to maintain water quality and comply with state and federal drinking water regulations, a chlorine-based disinfectant residual concentration is required in all parts of the distribution system. The state and federal regulatory requirement to maintain a disinfectant residual in all parts of a public drinking water system is one of many steps that protects consumers from pathogens and waterborne disease. At the same time, we recognize that disinfectants in drinking water discharges have the potential to be harmful to aquatic life. So we have become experienced and proficient in applying a variety of best management practices (BMPs) to dechlorinate drinking water discharges – both planned and emergency. We take very seriously our dual requirements to protect both human and environmental health.

Drinking water utilities do not have large point-source discharges and must dechlorinate at constantly-changing field locations using Best Management Practices (BMPs) and Best Available Technology Economically Achievable (BAT). There is no field monitoring equipment available that will detect total residual chlorine to the proposed TRC Policy. That does not mean that dechlorination is not accomplished, because field dechlorination techniques are just as effective as stationary, the chemistry is all the same. It is just impractical and unnecessary to regulate a small intermittent discharge in the same manner as a large continuous point discharge. A one-size-fits-all regulation is simply not practical and that is why non-point drinking water discharges all across the USA are regulated by BMPs and not numeric effluent limits.

Accordingly we commend the SWRCB for recognizing that it is technologically infeasible for potable water dischargers to comply with numeric effluent limits as authorized under the Code of Federal Regulations (CFR), Title 40, Section 122.44(k), revised July 1, 2004. Discharges of drinking water should continue to be regulated under MS4 Permits or RWQCB General Permits that require the implementation of BMPs and/or best available technology economically achievable (BAT) based numeric effluent limits to reduce the discharge of total residual chlorine to the maximum extent practicable (MEP).

Thank you for your consideration. If you have questions, please contact me at 415-945-1556.

Sincerely,

Robert S. Castle, P.E.
Water Quality Manager

MARIN MUNICIPAL WATER DISTRICT- FAX

220 Nellen Avenue
Corte Madera, CA 94925
(415) 945-1455

DATE: **July 14, 2006**

TO: **Song Her, Clerk to the Board**

FAX NO. **916-341-5620**

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NUMBER OF PAGES (including this page): 3

REPLY TO FAX NUMBER: (415) 927-4953

MESSAGE:

Attached two page letter with comments on the Total Residual Chlorine Policy

Thank you